

**ELFIN FOREST/HARMONY GROVE FIRE DEPARTMENT INC.**  
**C.S.A. 107**  
**20223 Elfin Forest Road**  
**Elfin Forest, California 92029**



[www.elfinforestfire.org](http://www.elfinforestfire.org)

May 26, 2006

San Diego County Planning Commission  
5201 Ruffin Road, Suite B  
San Diego, CA 92123

Re: The Bridges at Rancho Santa Fe Final EIR certification


Dear commissioners,

The Elfin Forest/Harmony Grove Town council has brought to our attention the fact that the aforementioned document contains a new emergency egress route (referred to as "the Northerly Route") that would empty evacuation traffic from Bridges Unit 7 onto private roads in Elfin Forest. Because this agency has not had an opportunity to review the impact(s) of this new route on emergency service through Elfin Forest specifically, we suggest a delay in the review process.

EFFD-1

We realize that any concerns that we have on the impacts to the safety of the community may be shared by our counterparts in Rancho Santa Fe, but we have not had the opportunity to coordinate with them in a comprehensive review.

Respectfully submitted,

  
D. E. Neville, Jr.  
Deputy Chief

for Frank Twohy, Fire Chief

Cc: Frank Twohy, Fire Chief  
file

ELFIN FOREST/HARMONY GROVE FIRE DEPARTMENT INC.  
C.S.A. 107  
20223 Elfin Forest Road  
Elfin Forest, California 92029



June 26, 2006

San Diego County Planning Commission  
5201 Ruffin Road, Suite B  
San Diego, CA 92123

Re: The Bridges at Rancho Santa Fe Final EIR

Dear Commissioners,

The Elfin Forest/Harmony Grove Fire Department is concerned that the emergency egress route referred as the Northerly Route does not have any planned or confirmed improvements to the road once it leaves the project property.

Presently the road is a narrow dirt and rutted road with vegetation in excess of five feet tall up to its edge.

As the road is presently constructed it is not all weather passable or safe. The department is very concerned that if this road were to stay as it is today it would be impassable in an emergency and possibly trap any person attempting to use it.

The department is not aware of any plans the developer has to extend and improve this road that is not on there property.

EFFD-1

Sincerely,

Frank Twohy  
Fire Chief

<b>ELFIN FOREST/HARMONY GROVE FIRE DEPARTMENT</b>	
EFFD-1	The comment refers to the northerly access route, which was a part of the Unit 7 Project, which has been withdrawn. Refer to Introduction. The comment does not apply to Alternative C.



**2006 Board Members:**

Eric Anderson (chair)  
Cheri Smith (vice chair)  
Hersy Keithly (treasurer)  
Steve Barker (secretary)  
Mild Hoppenrath  
Bill Wilgenburg  
Gordon Fines  
Jeff Swenerton  
Jacqueline Arsivaud-Benjamin

20223 Elfin Forest Rd., Elfin Forest, CA 92029

May 25, 2006

San Diego County Planning Commission  
5201 Ruffin Road, Suite B  
San Diego, CA 92123  
Fax: 858 694 3373

Re: The Bridges at Rancho Santa Fe Final EIR certification

Dear Commissioners,

The matter mentioned above will be on the agenda of the June 2<sup>nd</sup> planning commission, and we as the representatives of the community in which this proposed development would be situated urge you strongly to request the EIR be re-circulated, or to grant a continuance.

EFTC-1

Our request for more time is based on three factors:

First, the Response to Comments emailed to us late Tuesday by the county contains a new element not previously contained in the draft EIR, and which directly affects the community we represent. We are referring to the new "Northerly Route, depicted in Figure 1 of Attachment 5" (response 11-1 to LAPCC). Although we have not been privy to Attachment 5 as of the writing of this letter, because the EIR is not published yet, we have met with the Rancho Santa Fe Fire District and confirmed that this new exit out of the proposed project would indeed be through our community. See below for a more exhaustive list of our reasons for needing more time to evaluate this new material fact.

EFTC-2

Second, we believe the County is making a factual error when stating that the project is not contained within the planning and land use purview of the Elfin Forest community. The same document mentioned above (Response to Comments) describes the basis for the County's assertion that the project is not in Elfin Forest, chiefly in H-12, but also I-8 and I-10. We assert that part of the basis on which this finding was made is not factual, and that the project as proposed is inconsistent with the community standards of the community it is a part of.

EFTC-3

Third, while the EIR circulation respects the letter of CEQA, we believe it violates its intent and spirit by effectively circumventing public comment in the process.

EFTC-4

**1. Addition of new "Northerly Route"**

We strongly object to the addition of a new emergency egress (the Northerly Route) through Canyon De Oro (incorrectly referred to in the EIR as Fortuna Ranch Road) and the rest of the private roads in Elfin Forest, without any of the affected property owners, local fire department, and other affected parties having a chance to review its likely impact. We understand that Unit 7 will be designed as a "shelter-in-place" community where residents are expected to stay in case of fire. However the emergency could be of a different nature, such as an earthquake that damages structures, where residents have to leave. Our key reasons for requesting more time include:

EFTC-5

- Lack of easement.

We do not believe the applicant has any legal easement to use our privately owned and maintained roads. Residents' legal properties include half of the current roads, and we do not believe there are recorded easements over our properties for the proposed project. Legal access out of the Northerly Route is likely to be West to Fortuna Ranch Road, but since that route is currently a narrow dirt road with steep grade which is has not been passable by most vehicles for much of the year, we believe evacuating residents would head onto the paved roads through Elfin Forest. There are also plans by the property owners to gate Canyon de Oro, a private road, which could further impede egress.

EFTC-6

- Potential endangerment of Elfin Forest residents without added mitigation.

We are concerned about the impact of this new route on Elfin Forest residents in case of fire or other emergency. There are two routes from the proposed Northerly Route in case of emergency: North through Canyon de Oro, and Fortuna del Este to the public road, Elfin Forest Road, or West through Canyon de Oro to Fortuna Ranch Road in Encinitas.

Access West to Encinitas is through a narrow, steep private dirt road surrounded by acres of chaparral that many luxury cars likely to be driven by Bridges residents could not negotiate in its current state. In 1996 that entire hill was on fire, and therefore may not be a viable exit route anyway. Access North to the public road (Elfin Forest Road) is through a series of narrow (16' in places), winding streets with speed bumps and a steep grade in one area. There are also several large animal-keeping facilities along this route, including a llama farm and rescue operation. Currently 46 homes use this route as their only emergency exit according to the Elfin Forest Fire Department.

EFTC-7

This very route was severely congested by evacuating traffic, including several horse trailers, during the last fire through the community in 1996, when there were fewer residents. The Northerly Route would add potentially evacuating traffic for an additional 26 homes, or a load increase of over fifty percent, through streets barely able to handle current evacuation traffic. At the same time this evacuating traffic is trying to leave, emergency vehicles would be entering from the opposite direction to protect our homes from a fire for example.

EFTC-8

It is our belief the current road infrastructure is woefully inadequate to accommodate the impact of the proposed Northerly Route in case of emergency.

EFTC-9

We therefore request the EIR be re-circulated so the impact of the Northerly Route on the roads mentioned above can be fully assessed and mitigated: will the roads need to be widened to meet county standards? Given these are private roads, with many property

EFTC-10

owners likely to resist road widening, how would it be implemented? Will speed bumps need to be removed? If so, what other traffic calming measures will be implemented? Will Canyon de Oro need to be widened and paved? What mitigation would the applicant offer the community for the impact created by this routing through our rural community?

EFTC-10  
Cont.

- Adverse impact to native habitat.

We object to what would be a considerably increased impact to the remaining native habitat if the existing dirt trail currently used by residents as a hiking trail (currently no wider than two people abreast in places) was enlarged to 24" to comply with fire emergency egress regulations (or even a reduced 20' as proposed in the FTR), with an added fuel modification zone on either side. We believe the EIR should be re-circulated so the increased impact of this new route can be fully reviewed, since the data were not included in the draft FTR.

EFTC-11

- Conditions of egress use need to be examined in detail

The Northerly Route is currently designed as emergency only, gated access. However given applicant's history of reversing its position on open space easement with Unit 6 for example, we want to make sure this supposed "emergency only" access could not in the future be used for construction access, as secondary regular access to the Bridges should they in the future decide to build on Fortuna Meadows or Chumas/Pappas, etc. Therefore we need time to look at the fine print and have our legal team insert language in the final FTR that would preclude any such changes in perpetuity. This would certainly need to be a condition of granting any easements to the project applicant.

EFTC-12

## 2. Assertion Project is not in Elfin Forest

The County continues to assert the project is not located in Elfin Forest, and uses that assertion to deflect comments from the San Dieguito Planning Group and TFCC that it does not conform to our community guidelines. The harm is that if the project was deemed to be in Elfin Forest, it would have to comply with our community standards. If it were deemed to be in Elfin Forest it could not meet 1-24 Goal II-7: "Encourage open space uses to direct urban growth to conform with the goals, objectives, policies and standards of the San Diego County's General, subregional and community plans." This project does not conform with the Elfin Forest community standards, which states "dark skies, 2 acres minimum, septic only, trail facilities, etc.", and that can be found at [www.cfhgdc.org/community\\_standards.htm](http://www.cfhgdc.org/community_standards.htm). We believe these assertions as listed below to be false, for the following reasons:

EFTC-13

- Equating Elfin Forest boundaries with CSA 107 boundaries.

The Elfin Forest community is distinct from the area currently served by CSA 107. CSA 107 encompasses other communities besides Elfin Forest, such as Harmony Grove and parts of Eden Valley, which are manifestly not part of Elfin Forest. They have their own community standards including zoning requirements and sewer policy that are different from those of Elfin Forest. Elfin Forest also includes several homes and parcels that have been historically part of Elfin Forest yet are not covered by CSA 107, including the applicant's (see description from Community Plan attached). Several current and past Town Council members live outside the CSA 107 boundaries, yet consider themselves part of Elfin Forest.

EFTC-14

We believe the applicant's actions to change the zip code north of the creek from 92029 to 92067, to have their project "annexed" by the Rancho Santa Fe Fire Department instead of covered by the Elfin Forest Fire Department, which is still closer and likely to be the first responders in an emergency regardless of boundary, and finally to have the Rancho Santa Fe Treatment Plant extend coverage to the project's area are all efforts to deceive the agencies as to the planning area the project rightfully belongs in, to avoid having to comply with the existing community standards. Please note that the water service to the project is OMWID, which also serves Elfin Forest but not Rancho Santa Fe.

EFTC-15

- Stating project access will be solely from the South

While the access to the project will be through the main Bridges entry gate, there now are provisions in this revised EIR to use Elfin Forest as an emergency route, as described above. Should Unit 7 residents be trapped from the South in an emergency, the Elfin Forest Fire Department will be the only Fire agency able to get to the project in a timely manner through the proposed Northerly Route. While it would be a short time for the Elfin Forest Fire Department to access the project from their station, through the Northerly Route, Rancho Santa Fe Fire would have to travel through Encinitas and San Marcos (San Elijo Hills) via the only existing paved roads to the Northerly Route, which we estimate would take a minimum of 30 to 45 minutes.

EFTC-16

- The project is "visually separated from Elfin Forest"

...by significant topographic buffers, including vast open space ...and hills...". There are no such buffers since the project is at the foot of Paint Mountain, which is located squarely in Elfin Forest. Five of the eight current Elfin Forest residents who live on Paint Mountain (none of whom have ever received a notice that this project was going forward) will be looking directly over the project. The Project and the new access road will disturb current viewshed. Unit 7 is located within 1200' of the existing homes on Paint Mountain Road.

While the applicant discusses "*the retention of the Escondido Creek corridor in its natural condition as an open space feature that distinguishes the Rancho Santa Fe community*", no mention is made of how the acres of open space the applicant proposes to bulldoze are a key differentiating feature of the Elfin Forest community. Elfin Forest is characterized by open spaces, natural canyons and creeks, and the project as described would obliterate this distinct and separate character of the southern portion of the Elfin Forest community. The project would be visible from the rest of the Elfin Forest open land surrounding the project, and to the residents of Paint Mountain, and destroy the current vistas. It would fundamentally change the character of the southern end of Elfin Forest from open space and rural properties on large lots to a suburban sprawl complete with sewer, lights, and pavement.

EFTC-17

- Sewer service already exists north of the creek at unit 6

Unit 6 is not in the area historically designated as Elfin Forest (see description from Community Plan), but Unit 7 is described as part of Elfin Forest by the applicant's own environmental consultant, Helix Environmental Planning, in their letter dated September 23, 2003, which states: "Fortuna Meadows (...) occupies 13 acres in Elfin Forest" (Fortuna Meadows is adjacent to Unit 7). The Planning Group responsible for land use issues in and around the project, the San Dieguito Planning Group, have repeatedly asserted in their comments to the Draft EIR that they consider the project as part of Elfin Forest.

EFTC-18

### 3. Violation of spirit of CEQA

As noted above, while the final EIR is being circulated before the 10 day required deadline under CEQA, there is no opportunity for the public to make input as we believe is the intent of CEQA.

- While the FEIR is dated March 17<sup>th</sup>, 2006, it was not available to any agency or citizen until today, Thursday May 26<sup>th</sup>. We find the date discrepancy curious.
- The EIR should not be circulated as a Final EIR, but re-circulated as a draft, because it contains material new information with an impact outside the project boundaries (the Northerly Route), which was not available for public comment during the draft EIR review period.
- None of the surrounding land owners and residents, including the aforementioned residents of Paint Mountain residing within less than a quarter mile of the proposed project, was ever notified personally of this project at any point in the process, including when the draft EIR was released in June 2005. Most are still unaware that what they consider their backyard, and the dedicated open space in Unit 6 that they had a right to believe would be left as such in perpetuity, are about to be turned into urban sprawl, in violation of the local community standards. We consider the reply from County that notices were published in the San Diego Union Tribune woefully inadequate, since the surrounding affected residences were easy to identify and few enough in number that failure to mail them a notice can only be interpreted as a tactic to avoid meaningful feedback on the impact to the local community.

EFTC-19

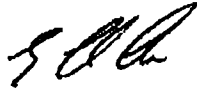
EFTC-20

EFTC-21

In closing, we would like to join the Elfin Forest Fire Department, the Escondido Creek Conservancy, and the San Dieguito Planning Group in urging you to consider re-circulating this EIR, or grant a continuance. We continue to oppose the project as it vacates a dedicated open space easement and doesn't conform to our community standards (minimum 2 acre lots and no sewer).

EFTC-22

Respectfully submitted,



Eric Anderson  
Chair, Elfin Forest Harmony Grove Town Council



Appendix: from [http://www.cfhgtrc.org/community\\_standards.htm](http://www.cfhgtrc.org/community_standards.htm)

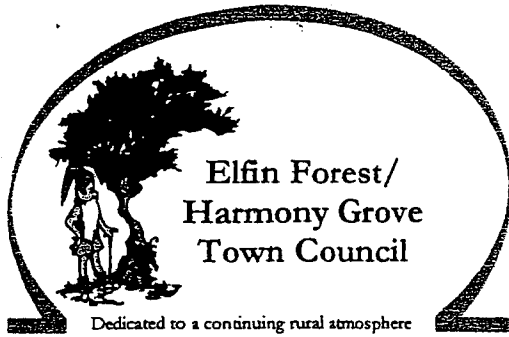
## ***Elfin Forest Community Plan***

By Kathy Pickard and Linda Hamilton

### ***Location, Physical Characteristics, Population***

Elfin Forest geographically sits to the east of La Costa and Encinitas. It is situated in two intersecting valleys, one running north-south, and the other running east-west. Both valleys are cradled by dramatic brush-covered hills and granite formations. The valleys are isolated by the topography of the surrounding hills and are rural in character. The valleys are home to a diverse population of native plants and animals, including deer, coyotes, bobcats, red fox, golden eagles, hawks and other raptors, Bell's vireos, gnatcatchers, ravens and numerous plant species. A multitude of species that thrive in this area are on protected lists.

The Escondido Creek extends from the eastern edge of Harmony Grove and continues through Elfin Forest to the northern edge of Rancho Santa Fe.



**2007 Board Members:**

Jeff Swenerton (chair)  
Mid Hoppenrath (vice chair)  
Betsy Keithley (treasurer, secretary)  
Eric Anderson  
Jacqueline Arsivaud-Benjamin  
Steve Barker  
Melanie Fallon  
Gordon Fines  
John Phillips

20223 Elfin Forest Rd., Elfin Forest, CA 92029

Mr. Bill Stocks  
County of San Diego Planning and Land Use  
County of San Diego; Regulatory Planning Division  
5201 Ruffin Road, Suite B  
San Diego, CA 92123

September 17, 2007

**Re: Petitions regarding The Bridges At Rancho Santa Fe Unit 6 project (SPA 01-004, TM 5270RPL, P85-084W, P85-064W)**

Dear Mr. Stocks,

Please find enclosed 65 petitions signed by registered voters in our community opposing the approval of the application for Unit 6 of the Bridges at Rancho Santa Fe. While we are not aware of when this project will be reviewed by the Planning Commission, we understand it could be in the next few months, and we respectfully request that these petitions be made part of the record.

The Elfin Forest Harmony Grove Town Council opposes the proposed Unit 6 project, for the reasons stated in the petition, and urges the county to deny this application.

EFTC-23

Sincerely,

Jeff Swenerton

Chair, Elfin Forest Harmony Grove Town Council

Cc: San Diego County Supervisors Bill Horn, Pam Slater, Diane Jacobs, Greg Cox, and chair Ron Roberts; and Paul Marks, Chair, San Dieguito Planning Group.

# Elfin Forest / Harmony Grove Town Council

## Bridges Unit 6 Petition

I, Elizabeth M. Kentley am a registered voter  
(Print name)  
of San Diego County and own land or reside within the legal boundaries of County  
Service Area 107 – Elfin Forest.

Do hereby support the following:

1. The application for the Bridges at Rancho Santa Fe Unit 6 (SPA 01-004, TM 5270RPL, P85-084W, P85-064W) should be denied as per DPLU staff recommendation dated August 25, 2006:

a. One of the two stated reasons a biological open space easement was designated in Unit 6 in 1986 was "to answer concerns about visual impacts" (FEIR 3/17/06 G4 response). Allowing the project to go forward would constitute a *breach of trust* with the public since that impact cannot be mitigated for, should housing be allowed on the current buffer agreed to by neighbors as a condition of support of the original project.

EFTC-24

2. Vacating this viewshed and biological open space easement would create a dangerous precedent:

a. Many community agencies, most notably the San Dieguito Planning Group in their comment letter of August 5, 2005, have expressed concern about what would be a precedent-setting event if the vacation took place. "This sets a very frightening precedent (...). It would open the door for future vacations of hundreds of acres of dedicated biological open space." (FEIR 3/17/06 I16)

EFTC-25

b. Open space, beautiful views, and nature are defining characteristics of the community of Elfin Forest, with hundreds of acres of open space potentially at risk from development should this vacation occur.

EFTC-26

3. Unit 6 as currently described has potential growth inducing effect:

a. While the application for Unit 7 has been withdrawn by a letter dated March 4, 2007 from Lennar, the developer has not stated any plans to protect Unit 7 from development in the future by selling it to a land conservancy.

EFTC-27

b. Without Unit 6 there can be no Unit 7, since the bridge from Calle Ponte Bella is necessary for access to Unit 7. Without a commitment from the Applicant to protect Unit 7, Unit 6 has to be stopped to prevent further growth in the future.

EFTC-28

Signature

Date

Address

City

State

Telephone

E-mail

**ELFIN FOREST/HARMONY GROVE TOWN COUNCIL**

EFTC-1	The requested continuances were granted. Re-circulation of the draft EIR is not warranted since no new significant impacts have been identified. Section 15088.5 of the State CEQA Guidelines requires that a lead agency (i.e., the County of San Diego) re-circulate a draft EIR when significant new information is added to the draft EIR after public review of the draft EIR but before certification. Significant new information can include changes in the project or environmental setting as well as additional data or other information. However, the new information added to a draft EIR is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible alternative) that the project's proponents have declined to implement. As noted in the final EIR (which includes underline/strikeout changes to the draft EIR), there have been no substantive revisions to the draft EIR. The final EIR includes all responses to public comments as a result of the 45-day public review of the draft EIR. The County has reviewed and analyzed the changes in the draft EIR which have occurred since public notice has been given, and those changes to the EIR do not meet the criterion for recirculation of the draft EIR pursuant to CEQA Guidelines Section 15088.5.
EFTC-2	Refer to Response to Comment EFFD-1.
EFTC-3	The County does not agree with this comment. As noted in final EIR Responses to Comments I-8 and I-10, the EIR evaluates the project in relation to adopted community plans within the County of San Diego. The Alternative C project falls within the San Dieguito Community Plan area and thus, that Community Plan and the County of San Diego General Plan were utilized to determine the project's consistency with the applicable goals and policies.
EFTC-4	Numerous opportunities have been provided for public comment and input throughout the CEQA process for this project. It should be noted that CEQA does not require responding to written comments submitted after the public review period of the draft EIR ends. However, the County is reviewing and responding to comments received within a reasonable time before the Planning Commission hearing in an effort to address such concerns.
EFTC-5	Refer to Response to Comment EFFD-1.
EFTC-6	Refer to Response to Comment EFFD-1.
EFTC-7	To the extent that this comment refers to the northerly route, it was part of the Unit 7 Project which has been withdrawn. Refer to Introduction, and to Response to Comment EFFD-1. As to the access from the west via connection to Bumann Road, this has been thoroughly reviewed in the draft EIR. See final EIR Response to Comment P-3.
EFTC-8	Refer to Response to Comment EFFD-1.
EFTC-9	Refer to Response to Comment EFFD-1.
EFTC-10	Refer to Response to Comment EFFD-1.
EFTC-11	Refer to Response to Comment EFFD-1.
EFTC-12	Refer to Response to Comment EFFD-1.
EFTC-13	This site is not within the Elfin Forest community. Refer to Response to Comment EFTC-3. Refer also to final EIR Response to Comment I-8.
EFTC-14	Refer to Response to Comment EFTC-13.

EFTC-15	Refer to Responses to Comment EFTC-3 and EFTC-13. In addition, the comment referred to a sewer line which was proposed with respect to the Unit 7 Project, but which is not part of Alternative C project. Thus, that portion of the comment no longer applies. As noted in final EIR Section 6.2.10, sewer services are available from the Rancho Santa Fe Community Services District; these services already exist in Unit 6, north of Escondido Creek.
EFTC-16	Refer to Response to Comment EFTC-1. It should also be noted that the alternative C includes an emergency access road via Bumann Road (toward Encinitas) which would be the quickest route for the Rancho Santa Fe Fire Department. See Response to Comment EFTC-7.
EFTC-17	This comment refers primarily to the Unit 7 Project, which has been withdrawn. See Introduction. The development which comprises Alternative C is considerably removed geographically from the Elfin Forest area, and while it is possible that a portion of the Unit 6 parcel may be visible from Paint Mountain (which is more than one mile away to the north) or other areas within Elfin Forest, views from the north looking south encompass a substantial geographic area and larger viewshed, with intervening vegetation and topography partially obscuring a view of Unit 6. Refer to Responses to Comments EFTC 3 and 13. Alternative C describes the new preferred project alternative, and potential impacts to land uses and visual resources from the development of Alternative C are analyzed in Chapter 4.6 of the final EIR. Impacts to land use and visual resources were determined to be less than significant.
EFTC-18	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction. The comment does not apply to Alternative C.
EFTC-19	The County used the California Environmental Quality Act (CEQA) and CEQA Guidelines to process this project for environmental impacts. The draft EIR was circulated for public comment with a deadline for public comment of August 15, 2005. All comments received within that time were carefully reviewed and a proposed final EIR was prepared and dated March 17, 2006. It was circulated as required before the scheduled hearing date. Several persons, including the Elfin Forest/Harmony Grove Town Council submitted further comments in response. The proposed hearing was continued several more times. All comments received after the FEIR of March 17, 2006 was distributed have been reviewed and the responses are now part of the record, including this response.
EFTC-20	Refer to Response to Comment EFTC-19.
EFTC-21	Refer to final EIR Response to Comment I-7, and to Response to Comment EFTC 19.
EFTC-22	Refer to Response to Comment EFTC-1, above.
EFTC-23	This supplemental letter from the Elfin Forest Town Council had 65 identical petitions attached. One of those is attached here, with the following five (5) numbered comments. The other petitions are the same, but for the name of the signatory person, and are not shown here for reasons of space. They are attached to the end of the Responses.
EFTC-24	Refer to Response to Comment BRUN-7. That response summarizes the purposes for which the easement was created, and the fact that the eventual vacation of the easement was contemplated by the County at the time of creation, and specific provisions for such vacation were established. That response also summarizes how what is being proposed is consistent with those standards. The easement over Unit 6 was primarily intended to protect a plant which, today, is no longer designated as sensitive, and has not been found on the site. The easement will be replaced at a 4:1 ratio with environmentally superior habitat. There is no breach of any trust with the public in regard to this easement.

EFTC-25	The vacation of this easement, and replacement with the mitigation land specified in Mitigation Measure MM 4.6-3a will not be a precedent for future vacation of dedicated biological open space. The easement over Unit 6 is unique, in that its eventual relocation was contemplated in the original conditions of approval. The easement over Unit 6 was primarily intended to protect a plant which, today, is no longer designated as sensitive, and has not been found on the site. The easement will be replaced at a 4:1 ratio with environmentally superior habitat. This replacement is consistent with County Board Policy I-103. See discussion in Response to Comments, BRUN-7.
EFTC-26	As stated elsewhere, the project which is Alternative C is not part of the Elfin Forest, and is actually some distance from the Elfin Forest boundaries. At the same time, the Alternative C project will be compatible with its surroundings, including the Elfin Forest area. See Responses to Comments, EFTC-3, 13 and 17, and SDPG 65. See Final EIR Response To Comment I-8.
EFTC-27	Unit 7 has been totally withdrawn from consideration, and there is no development application pending for any activity on Unit 7. As such, discussion of hypothetical future development there is not appropriate in the consideration of Alternative C. Whether the property is available for sale to a land conservancy is not within the authority of the County, and is not relevant to consideration of Alternative C.
EFTC-28	There is no proposal for any bridge to Unit 7. There is no longer any proposal for development on Unit 7 as part of this application. See Response to Comments EFTC-26. At the time Unit 7 was being considered, there was a proposal for a northern access to that site, which did not cross any part of Unit 6. Unit 7 is composed of six separate legal parcels, and any future development on such site would stand on its own and be subject to independent processing by all applicable governmental authorities.

PC, 6/2/06, #2

Jones, Cheryl

From: Loy, Maggie A  
Sent: Wednesday, May 24, 2006 1:08 PM  
To: Jones, Cheryl  
Subject: Correspondence: The Bridges 6-2-06 Planning Commission Hearing

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From: Dan Silver [mailto:dsilverla@earthlink.net]  
Sent: Wednesday, May 24, 2006 9:55 AM  
To: Loy, Maggie A  
Cc: Gibson, Eric; Oberbauer, Thomas A; Pryor, Gary L; Mike Grim  
Subject: The Bridges off site mitigation

VIA ELECTRONIC MAIL ONLY - ACKNOWLEDGEMENT REPLY REQUESTED

May 24, 2006

Maggie Loy  
DPLU  
5201 Ruffin Rd., Suite B  
San Diego, CA 92123

**RE: The Bridges**

Dear Ms. Loy:

As you know from earlier comments, EHL believes an alternative (using 0.5-acre luxury home sites) should be prepared, thus creating a project design that preserves more critically important core gnatcatcher habitat on-site. Whether or not project redesign occurs, however, there will remain the need to adopt some amount of off-site mitigation. In this context, I wish to alert you to the conflicts presented by some of the proposed mitigation parcels with the City of Carlsbad's implementation of its Habitat Management Plan (HMP). The specific parcels with conflicts are the Choumas Pappas and Alemir properties.

As background, in order to mitigate the loss of coastal sage scrub and gnatcatcher habitat within the MHCP cities that precluded a viable core area within the municipalities, the MHCP opted to conserve an additional 400 to 500 acres of coastal sage scrub primarily within the unincorporated county. This "unincorporated gnatcatcher core area" encompasses the northwestern half of a large swath of high-quality gnatcatcher habitat that extends southeast from the Villages of La Costa property in southeastern Carlsbad to the Del Dios/Lake Hodges area in the unincorporated county.

In turn, Carlsbad's HMP commits to conserve 307 acres of the unincorporated core area. Both the Choumas Pappas and Alemir properties are part of this planned conservation. Indeed, a set price - now substantially below market - is in effect for the parcels. The most recent Carlsbad fee ordinance (see Exhibit 1 on page 20 of the attachment document) shows that acquisition by The Bridges project has already forced Carlsbad to relinquish acreage on Choumas Pappas and seek more expensive sites. If Alemir is approved by the County as mitigation for Bridges, the same will have to occur for the Alemir acreage.

County-approved mitigation sites should *not* compete with and undermine the City of Carlsbad's planned conservation under the HMP and MHCP. Specifically, the County should not accept either the Choumas Pappas or Alemir sites, despite approval by the USFWS in a Section 7 consultation. This consultation did not have County, CDFG, or public input. Although taking advantage of previously negotiated, below market prices is convenient for Lennar, purchase in advance of County approvals was clearly at their own risk. Parenthetically, if Lennar had chosen to participate in the County's own HLP process, rather than trigger a closed-door Section 7 consultation through a tiny wetlands impact, these conflicts could have been averted.

In conclusion, if off-site mitigation is approved for The Bridges, Lennar should seek parcels other than Choumas Pappas and Alemir. The County should not force its neighbor and partner in regional habitat planning, the City of Carlsbad, to revise its fee ordinance upward. The real estate division of Lennar can and should identify *other* parcels that will complement the previously planned conservation commitments of the HMP. Lennar can sell its interest in Choumas Pappas and Alemir to the

5/26/2006

The Bridges off site mitigation

2 - 206

Page 2 of 2

City of Carlsbad as fees are collected.

EHL-1  
Cont.

Sincerely,

Dan Silver  
Executive Director  
Endangered Habitats League  
8424-A Santa Monica Blvd., #592  
Los Angeles, CA 90069-4267

Tel 213-804-2750  
Fax 323-654-1931  
dsilverla@earthlink.net  
.. www.ehleague.org

5/26/2006

- 216 -



**ENDANGERED HABITATS LEAGUE****EHL-1**

The Applicant has withdrawn Unit 7 from its project application. Alternative C describes the new preferred project of which the Applicant is seeking approval. Impacts from the development of Unit 6 and the golf course driving range reconfiguration are analyzed in Alternative C, as discussed in Chapter 4.6 of the final EIR, and all impacts have been mitigated to a level below significant. Refer to Introduction and Preface. As to the issue regarding Carlsbad, please refer to Response to Comment CARL-1.

**LAW OFFICES OF EVERETT L. DELANO III**

#2

220 W. Grand Avenue  
Escondido, California 92025  
(760) 510-1562  
(760) 510-1565 (fax)

May 31, 2006

VIA FACSIMILE &amp; U.S. MAIL

County of San Diego  
Attn: Cheryl Jones  
5201 Ruffin Road, Suite B  
San Diego, CA 92123

Re: The Bridges Unit 6: SPA 01-004, TM 5270RPL, P85-084W, P85-064W; The  
Bridges Unit 7: TM 5239RPL, AD 01-001, S01-077; Santa Fe Creek: SPA 03-  
006; Final Environmental Impact Report

Dear Ms. Jones:

This letter is submitted on behalf of The Escondido Creek Conservancy ("TECC") in connection with the proposed Bridges at Rancho Santa Fe, Units 6 & 7, development project ("Project") and Final Environmental Impact Report ("FEIR"). Please ensure that copies of this letter are provided to Planning Commission members prior to their consideration of the Project and FEIR at this Friday's Planning Commission meeting.

ECC-1

**INTRODUCTION**

The California Environmental Quality Act ("CEQA"), Pub. Res. Code §§ 21000 - 21177, must be interpreted "so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal. App. 3d 247, 259. If an EIR fails to provide agency decision-makers and the public with all relevant information regarding a project that is necessary for informed decision-making and informed public participation, the EIR is legally deficient and the agency's decision must be set aside. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 712. An EIR is "aptly described as the 'heart of CEQA'"; its purpose is to inform the public and its responsible officials of the environmental consequences before they are made. *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 392.

ECC-2

**INADEQUATE DISCUSSION OF PROJECT IMPACTS**

The FEIR's discussion of land use and visual impacts is insufficient. A prior EIR determined that open space was important to reduce visual impacts. The FEIR claims that this same open space can be vacated, yet there is no discussion as to whether and how conditions have changed since the adoption of the prior EIR. FEIR at 6.1 - 6.2. If

ECC-3

Comments re Bridges Units 6 & 7  
May 31, 2006  
Page 2 of 3

the open space was important previously, it should be important today unless factors have changed significantly.

ECC-3  
Cont.

The FEIR's discussion of impacts to biological resources is insufficient. Among other things, the FEIR fails to address the revised project's impacts on biological resources. Furthermore, the FEIR improperly defers mitigation. Deferring the preparation of mitigation is improper under CEQA, except in limited circumstances where "practical considerations prohibit devising measures early in the planning process (e.g., at the general plan amendment or rezone stage)." *Sacramento Old City Assn. v. City Council of Sacramento* (1991) 229 Cal. App. 3d 1011, 1028; *see also* CEQA Guidelines § 15126.4(a)(1)(B).

ECC-4

The FEIR fails to provide an adequate discussion of noise impacts. For example, there is no discussion of impacts to wildlife. In fact, several construction activities could be happening simultaneously on a project of this size. *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344, 1381.

ECC-5

The Project is likely to have growth inducing effects, which are insufficiently addressed in the FEIR. Development of the Project is likely to lead to further development in the area, both in those areas not set aside by the Project and in those areas where open space may again be vacated at some future point in time.

ECC-6

#### INADEQUATE ALTERNATIVES ANALYSIS

CEQA requires that an EIR "produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." *San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750 - 51. "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." CEQA Guidelines § 15126.6(b). "Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process." *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 404.

ECC-7

Here, the Project and its objectives are defined too narrowly, thereby resulting in a narrowing of the consideration of alternatives to the Project. Furthermore, the FEIR rejects environmentally superior alternatives. CEQA contains a "substantive mandate" that agencies refrain from approving a project with significant environmental effects if "there are feasible alternatives or mitigation measures" that can substantially lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4<sup>th</sup> 105, 134; Pub. Res. Code § 21002. It "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects." *Sierra Club v. Gilroy* (1990) 222 Cal.App.3d 30, 41. The County has not provided findings supported by substantial

ECC-8

Comments re Bridges Units 6 & 7  
May 31, 2006  
Page 3 of 3

evidence in the record that environmentally superior alternatives and mitigation are infeasible or impracticable. *Pacific Corp. v. City of Camarillo* (1983) 149 Cal.App.3d 168, 178. The FEIR provides only cursory rejections of environmentally superior alternatives without supporting analysis.

ECC-8  
Cont.

Additionally, CEQA requires that the "no project" alternative "discuss the existing conditions ..., as well as what would be reasonably expected to occur if the project were not approved, based on current plans and consistent with available infrastructure and community services." CEQA Guidelines § 15126.6(e)(2). The FEIR does not consider a "no project" alternative consistent with this requirement.

ECC-9

### ***THE NEED TO RECIRCULATE THE EIR***

Recirculation of an EIR is required whenever the lead agency adds significant new information. Pub. Res. Code § 21092.1; *Laurel Heights Improvement Assoc. v. University of California* (1993) 6 Cal.4<sup>th</sup> 1112, 1130. For example, the FEIR does not discuss off-site improvements associated with the northerly access route and its potential impacts. FEIR at 1-4 and Figure 1.1-2. There is no discussion of the potential effects associated with cutting open space into two halves, there is no discussion of connectivity effects to wildlife or edge effects. *But see* FEIR Section 2.2.2 (listing thresholds of significance). In this instance, the Project has been revised and the FEIR should be recirculated with careful attention to the revised Project and its potential impacts.

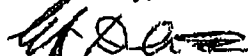
ECC-10

### ***CONCLUSION***

For the foregoing reasons, TECC requests that the Planning Commission reject the Project and the FEIR. If you have a question or need additional information, please contact me. Thank you for your consideration of these comments.

ECC-11

Sincerely,



Everett DeLano, Esq.

**ESCONDIDO CREEK CONSERVANCY**

ECC-1	All comment letters received after the end of the draft EIR public review period on August 15, 2005 and before the Planning Commission hearing are included in the public hearing documents, all available to the Planning Commission members.
ECC-2	The County acknowledges and appreciates the comment.
ECC-3	The draft EIR, as summarized in final EIR Response to Comment G-5, specifically addresses what conditions have changed with regard to the visual and biological setting of Unit 6 and the consequence of vacating this open space area. With regard to visual setting, Unit 6 is surrounded by estate residential to the north, west, south and a golf course to the southeast. At the time the original open space was dedicated, estate homes were only found to the west. As noted in Response G-5, the original key reason for the dedication was to protect what was once a sensitive plant and the visual mitigation was added in response to public testimony in 1986 by adjacent property owners. However, the 1986 final EIR for the Canyon Creek Country Club Specific Plan also included a second measure (4-B) that allowed for the vacation of this open space (both as to habitat issues and as to visual issues) if an alternative open space was identified which meets the specified criteria. The mitigation land is discussed in Chapter 4.6 of the final EIR, and is further discussed in Response G-5, and meets the criteria as to quality and quantity. Also refer to Response to Comment BRUN-7.
ECC-4	To the extent that the comment refers to Unit 7 portions of the Proposed Project, it is no longer applicable. The Applicant has withdrawn Unit 7 from its project application. Alternative C describes the new preferred project of which the Applicant is seeking approval. Impacts from the development of Unit 6 and the golf course driving range reconfiguration are analyzed in Alternative C, as discussed in Chapter 4.6 of the final EIR, and all impacts have been mitigated to a level below significant. Refer to Introduction and Preface.
ECC-5	The draft EIR, Section 2.2, addresses a number of direct temporary and indirect impacts to biological resources, including short-term noise impacts to wildlife (2.2.4f.6). These impacts and associated mitigation measures also apply to alternative C, as discussed in Section 4.6 of the final EIR. In addition, the project Conditions of Approval (page 13, conditions 19 and 20) include measures to avoid short-term noise impacts to wildlife as a result of project construction.
ECC-6	The County disagrees that the project would result in growth inducing effects. The question of growth inducing impacts is adequately addressed in Chapter 5 of the final EIR.
ECC-7	The County of San Diego acknowledges and appreciates this comment. It is an accurate statement of certain legal principles from the cited cases.
ECC-8	The Alternative C project will have significantly fewer impacts than the Proposed Project, the No Project/Existing Plan Alternative, Reduced Alternative A or Reduced Alternative B. See Introduction and Preface. Chapter 4.0 of the final EIR includes an analysis of a reasonable range of alternatives pursuant to Section 15126.6(a) of the State CEQA Guidelines.
ECC-9	The County does not agree with this comment. Section 4.3 of the draft EIR evaluates the "No Project/Existing Plan Alternative" which is a plan that reflects current land use plans and zoning and can be expected to occur if the proposed project does not get approved.
ECC-10	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction. Thus, the comment is not applicable to Alternative C. As to recirculation, see Response EFTC-1.
ECC-11	The County of San Diego acknowledges and appreciates this comment.



"Loy, Maggie A"  
<Maggie.Loy@sdcountry.ca.gov>  
ov>

05/31/2006 06:05 PM

To: "Laurel Lemarie" <whyfretl@mac.com>

cc: "Stocks, William" <William.Stocks@sdcountry.ca.gov>

"Anzures, Claudia F" <Claudia.Anzures@sdcountry.ca.gov>

<Karen.Mossberg@Lannar.com>

bcc

Subject: RE: Decorative Fence on the Bridges Project, Unit 6

Laurel,

In response to number 1, I found the reference to the condition of approval (see page 2-91 of the staff report) and it does require "decorative" fencing. I agree that chainlink is not decorative. I hope that the condition language I have included this time around will ensure compliance.

In response to number 2, I assure you that the open space easements proposed this time around are permanent and will be in place in perpetuity. I will be modifying all of the new open space easement condition language to specify that the easements are in "perpetuity." This will be done prior to the Board of Supervisors hearing.

Thanks,  
Maggie.

-----Original Message-----

From: Laurel Lemarie [mailto:whyfretl@mac.com]

Sent: Wednesday, May 31, 2006 3:44 PM

To: Loy, Maggie A

Cc: Stocks, William; Steve Brunst; Karen.Mossberg@Lannar.com; Jones, Cheryl; Horn, Bill

Subject: Re: Decorative Fence on the Bridges Project, Unit 6

Maggie,

I have 2 requests:

1. Will you please look at the final approval for Bridges Units 1-6 to see what type of fence was proposed? It is my understanding that the fence was to conform to community character, and be a wooden fence, not the military/industrial fence that is there now, over 6' tall with additional arm of 3 barbed wires.

LL-1

2. Please look at the wording concerning the OS contiguous with Unit 7 and/or other Lennar property owned north of Escondido Creek. I would like to know if they worded the condition on the OS as "until" (as we discussed) as they did in Unit 6, or "in perpetuity"? If they used the fudge word "until," I must speculate that Bridges will vacate that land, a la Unit 6 OS, and build Units 8, 9, 10, etc. Otherwise, Lennar could have purchased mitigation OS in some other area altogether that doesn't lend itself to development as part of The Bridges. I don't feel that the EIR addressed this potentiality, and the precedent exists in the very cases coming before the PC that Lennar buys mitigation OS, then condemns it for more dwelling units when they see fit.

LL-2

Laurel L. Lemarie, Member  
San Dieguito Planning Group  
PO Box 1031  
Rancho Santa Fe, CA 92067-1031  
858-756-2835 ph/fax  
whyfretl@mac.com

On May 31, 2006, at 1:01 PM, Loy, Maggie A wrote:

**LAUREL LE MARIE**

LL-1	The Conditions of Approval for the Alternative C project include the requirement for decorative fencing to the northerly boundary of Unit 6. Refer to Response to Comment BRUN-10.
LL-2	This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction. The references to other open space near Unit 7 are not applicable to Alternative C. However, the County's language in all Open Space Easements will include the phrase "in perpetuity" to ensure permanence for these conservation areas.

**Board of Directors**Robert F. Topolovac, *President*Susan J. Vary, *Vice President*Mark A. Muir, *Treasurer*Harold L. Gano, *Secretary*Robert J. Krauss, *Director*

**General Manager**  
David C. McCollom  
**Deputy General Manager/Operations**  
Harry Ehrlich  
**Assistant General Manager**  
Kimberly A. Thoner  
**General Counsel**  
Wesley Peltzer

1966 Olivenhain Road, Encinitas, California 92024 | Phone (760) 753-6466 | Fax (760) 753-4277 | [www.omwd.com](http://www.omwd.com)

June 22, 2006

San Diego County Planning Commission  
5201 Ruffin Road, Suite B  
San Diego, Ca. 92123

VIA US Mail &amp; Fax (858) 694-3373

Re: The Bridges at Rancho Santa Fe Unit 7 Final EIR Certification

Dear Commissioners:

The Olivenhain Municipal Water District has been requested by the proponents of the Bridges Unit 7 project to grant permission for the future residents of the project to be able to use a road over mitigation property owned by the District for emergency fire egress. While it is generally the District's policy to honor such a request, the current EIR depicts a circumstance that is unacceptable to the District. In the document dated March 17, 2006, Attachment 5, Figure 6, the proposed fire escape route is shown dead-ending at the District's "Pipelines West" easement. Please be advised that the "Pipelines West" easement is not available for any travel by the general public because of the severe and extreme road grades on this easement. Use of this route by conventional vehicles constitutes a substantial risk to the public. The District strongly objects to the emergency fire egress depicted dead-ending in this manner.

OMWD-1

In order to obtain the District's permission for any use of District easements in this vicinity it is necessary to use one of two alternatives not depicted in the EIR. The first alternative would be to continue the current dead-ended route all the way north to Canyon de Oro Road and then eastwardly to Fortuna del Este Road. Notwithstanding, this would still constitute an inferior and marginally useful emergency egress in the District's opinion due to its length and the numerous locked gates on this route. The District proposes a second alternative route that would be acceptable to this agency.

OMWD-2

The District's preferred alternative is depicted on the map enclosed with this letter. An existing dirt road, as well as a public egress easement, is believed to already exist on some of the roads connecting to Fortuna Ranch Road. This would provide a much more reliable and true emergency access without the unacceptable risks involving Olivenhain's "Pipelines West" pipeline right of way. The District requests that the appropriate fire officials be asked by the Planning Commission to review these

OMWD-3



OLIVENHAIN WATER DIST Fax: 760-753-1638

Jun 22 '06 16:36 P.02

San Diego County Planning Commission  
June 22, 2006  
Page 2 of 2

alternative routes. Further, the District requests that the environmental impacts of the alternative routes be analyzed.

OMWD-3  
Cont.

The District is ready to cooperate to advance the use of the preferred alternative; however, Olivenhain will be unable to authorize use of the "Pipelines West" easement for the above stated reasons. The District opposes the "dead end" emergency access currently depicted; it is believed dangerous and could potentially strand and trap people in an emergency.

OMWD-4

Thank you very much for consideration of our concerns.

Sincerely,

OLIVENHAIN MUNICIPAL WATER DISTRICT

  
David C. McCollom  
General Manager

**OLIVENHAIN MUNICIPAL WATER DISTRICT**

OMWD-1	The emergency access road referred to in this comment is associated with the Unit 7 Project, which has been withdrawn. See Introduction. The comment does not apply to Alternative C.
OMWD-2	See Response to Comment OMWD-1.
OMWD-3	See Response to Comment OMWD-1.
OMWD-4	See Response to Comment OMWD-1.

fax 858 694-3373  
item #2

3451 Bumann Road  
Encinitas, Ca. 92024  
May 24, 2006

Planning Commissioners  
Dept. of Planning & Land Use  
County of San Diego  
5201 Ruffin Road  
San Diego, Ca. 92123

Dear Planning Commissioners:

RE: Units 6 and 7 Lennar Homes The Bridges REQUEST FOR DENIAL

With all due respect to you Planning Commissioners but I am outraged with the frivolous and brush-off responses to serious letters of submittal by the public who honestly and I believe fairly participated in the democratic process. The responses are an insult and only increase public cynicism.

I submitted comments that I believe are worthy of resolution with real answers and solutions to make for a better project including issues dealing with the following:

1. barbwire added to Unit 6 six foot chainlink fencing where a deer got hung up PG-1
  2. fireworks shot off over biological open space PG-2
  3. flood lights over biological open space PG-3
  4. fleeing onto neighbor's property PG-4
  5. golf balls littering neighbor's property PG-5
  6. developer creating extreme fire hazard by planting eucalyptus and not maintaining limited building areas adjacent to existing homes PG-6
  7. gnatcatchers observed and heard in Unit 6 biological open space as recently as last week though never admitted observed by surveyors PG-7
  8. no matter how high a mitigation ratio, there is no comparable habitat in the entire area with that being proposed to be destroyed by the Bridges. All mitigation should be required onsite. PG-8
  9. vacating a biological open space in perpetuity is a breach of trust by government to those it is to represent, the people PG-9
- PG-10

FROM :

FAX NO. : 2-204  
0192359849

May. 26 2006 08:13AM P2

Page 2  
May 24, 2006

10. the only purpose of Unit 6 destruction of biological open space is profit, to create 5 lots incompatible in size to adjacent lots to sell, I've heard, for over \$3 million EACH. The environment and the public will lose.

PG-11

11. the 5 lots are located at the highest, most prominent point within the Bridges against goals of the county of San Diego.

PG-12

May I be so bold as to request you read the seven letters submitted by the public including mine. And I hope you agree and deny the project.

I thank you very much.

Sincerely,

*Ginger Perkins*

Ginger Perkins

TO: TOM OBERBAUER and MAGGIE LOY  
FROM: GINGER PERKINS  
FAX: 858 694-2555  
DATE: April 13, 2007

Tom and Maggie:

Attached is Andy Mauro's letter regarding surveys on Unit 6 of Lennar's The Bridges. I have observed 5-6 gnatcatchers at a time. Andy and group observed 6 pair last December. While Lennar's biologist has stated that there are no gnatcatchers in the past, I believe the fox is watching the henhouse.

PG-13

The Resnick recently purchased former Perkins property provides emergency fire etc access for adjoining properties that I hope/ request be considered when preservation for that property is planned. I can provide that information.

PG-14

Regards,

*Ginger Perkins*

858 756-3451

Ginger Perkins  
3451 Bumann Road  
Encinitas, CA 92024

April 9, 2007

**RE: Sightings of California Gnatcatcher at The Bridges of RSF Golf Course**

Dear Ms. Perkins:

As we discussed in our telephone conversation today, multiple numbers California Gnatcatchers have been observed at The Bridges of RSF Golf Course on each of five successive Audubon Christmas Bird Counts conducted from 2003 through 2006. I have been the team leader on the bird counts at The Bridges over this five-year period, and have submitted the tallies of each year's count for inclusion in the official overall totals for the Rancho Santa Fe Christmas Bird Count. (Ref. RSF Christmas Bird Count Official Results, Robert Patton, coordinator and compiler).

Our team has encountered California Gnatcatchers at several different locations along our route within the golf course over the years, and has consistently observed at least one pair of gnatcatchers in the undeveloped patch of sagebrush habitat that exists along the edge of the cart path which skirts the 12<sup>th</sup> hole fairway and leads to the 13<sup>th</sup> hole tee. Our 2006 Christmas Bird Count survey was conducted on 12/19/06, and recorded a minimum of six pairs of California Gnatcatchers in this general location. My understanding is that this particular parcel of habitat had been set aside as gnatcatcher habitat a number of years ago. In total, I have personally participated in seven bird surveys during the months of December and January from 2003 through 2006, and have observed California Gnatcatchers in this area on each occasion.

Each year, our Christmas Bird Count survey team at The Bridges generally includes three to four experienced birders, plus several amateurs. Criteria for classification as "experienced birder" includes membership in the San Diego Field Ornithologists, regular participation in official bird surveys conducted for the San Diego Natural History Museum (San Diego County Bird Atlas Project), the San Elijo Lagoon Conservancy (San Elijo Lagoon Monthly Bird Survey), and the National Audubon Society (Christmas Bird Count), and leader of public bird walks throughout the area. Participants are fully experienced with identification of the California Gnatcatcher by sight and sound.

Sincerely,



Andrew Mauro  
808 Capri Road  
Encinitas, CA 92024  
760-753-1266

**GINGER PERKINS**

PG-1	The County does not agree with this comment. The Responses to Comments have been completed according to the requirements of CEQA using the best information available. In instances in which a comment repeats the substance of an earlier comment, cross-referencing was utilized to limit redundancy.
PG-2	The comment refers to a prior comment by the same person listed in the final EIR as Comment Q-6. The chain link fence referenced in such comment is addressed in final EIR Response to Comment I-29. As to fencing for Alternative C, the final EIR (EIR page 1-5, and Section 4.6 for Alternative C) includes reference to installation of a 5-foot high decorative black tubular steel fence along the northern boundary of Unit 6, replacing the existing chain-link fence. Refer also to Response to Comment BRUN-10.
PG-3	The comment refers to prior fireworks. No fireworks are proposed as a part of Alternative C.
PG-4	There is no lighting proposed as part of Alternative C project. This comment refers to the Unit 7 Project, which has been withdrawn. See Introduction. Thus, the comment is not applicable to Alternative C.
PG-5	To the extent this comment referred to the Unit 7 Project, it is no longer relevant since Unit 7 has been withdrawn. See Introduction. For the remainder of the comment, please refer to final EIR Response to Comments Q-18.
PG-6	Refer to final EIR Response to Comment Q-9.
PG-7	Refer to final EIR Responses to Comments Q-20 through Q-24.
PG-8	Refer to final EIR Response to Comment Q-33. In addition, a new protocol survey for gnatcatchers was conducted by wildlife biologists of Helix Environmental Planning, Inc. between June 21, 2007 and July 4, 2007 regarding the Unit 6 location. During this protocol survey, no gnatcatchers were detected on Unit 6. See Response to Comments PG-13.
PG-9	To the extent that the comment refers to the Alternative C project components (Unit 6, driving range and Bumann Road emergency access), please refer to final EIR Response to Comment Q-34. To the extent that the comment refers to former Unit 7 Project, it is no longer relevant since Unit 7 has been withdrawn. Refer to Introduction and Preface.
PG-10	Refer to final EIR Response to Comment Q-3.
PG-11	The County of San Diego acknowledges and appreciates this comment. The financial gain or loss of a project is not relevant to CEQA. Refer also to final EIR Response to Comment Q-37.
PG-12	Refer to final EIR Responses to Comments G-5 and Q-38
PG-13	The commentor reports having seen gnatcatchers at or near Unit 6. The commentor's letter also attaches another letter in which its author reports for the first time that members of the Audubon Society participating in successive Audubon Christmas Bird Counts conducted from 2003 through 2006 have "encountered California Gnatcatchers at several different locations along our route within the golf course", and have "consistently observed at least one pair of gnatcatchers in the undeveloped patch of sagebrush habitat that exists along the edge of the cart path which skirts the 12th hole fairway and leads to the 13th hole tee." The author went on to state that the 2006 Christmas Bird Count was conducted on December 19, 2006 and "recorded a minimum of six pairs of California Gnatcatchers in this general location." These reported sightings were stated to have been made by a team which included members of the Audubon Society, but were not the result of protocol surveys for the gnatcatcher.

- As noted in Final EIR's Response to Comment Q-33, the habitat quality of the Unit 6 site was evaluated in the Draft EIR in Section 2.2 and a survey was conducted in 2001 in accordance with the latest United States Fish and Wildlife (USFWS) protocol for presence/absence of species to determine if gnatcatchers occupied the Unit 6 site, which survey included three separate visits to this site. As noted in Section 2.2, gnatcatchers were not detected within the boundaries of Unit 6 during the 2001 protocol survey, and the site was determined to be of low long-term conservation value for gnatcatchers as compared to other sites since it is surrounded on three sides by development. Based on its isolation and small parcel size, the Unit 6 site would not be targeted for long-term conservation even if the site were periodically visited by the gnatcatcher. The Project is being conditioned to mitigate for the Unit 6 habitat impacts at a 4:1 ratio, and the Alamere mitigation parcel has a higher habitat value for gnatcatcher use than the Unit 6 parcel because it is located within large blocks of conserved coastal sage scrub habitat that supports significant gnatcatcher populations. The proposed mitigation site is not exposed to the significant edge effects and fragmentation already present on Unit 6. Refer to Responses to Comments G-4, G-6, J-5 and Q-33 in the March 17, 2006 Final EIR.

In addition, in response to the questions raised by this comment (both by the commentor and in the additional letter attached by the commentor), a new USFWS protocol survey for California Gnatcatchers was conducted between June 20, 2007 and July 4, 2007 which included three separate visits to the Unit 6 site, and no gnatcatchers were detected, confirming the results of the 2001 protocol surveys. The 2007 survey was conducted in accordance with the latest United States Fish and Wildlife protocol for presence/absence of species, and covered an area including all of Unit 6. A report of such survey was filed with the County of San Diego by letter dated September 4, 2007 from HELIX Environmental Planning, Inc (HELIX) to Dr. Glenn Russell. As described in such report, the site visits each included specific attention to the area particularly identified by the Audubon commentor where gnatcatchers are reported to have been observed ("the undeveloped patch of sagebrush habitat that exists along the edge of the cart path that skirts the 12th hole fairway and leads to the 13th hole tee"), as well as survey routes which resulted in 100 percent coverage of the entire study area. No gnatcatchers were identified or noted. (See page 4 of the letter report.) If gnatcatchers had been present, they would have been readily observable within the areas between the survey routes, especially by experienced surveyors familiar with both visual and vocal identification of the gnatcatcher as was used during the HELIX site visits as part of the 2007 survey. As reported in the letter report, taped vocalizations of the gnatcatcher, consistent with USFWS protocol, were played every 3 to 5 minutes during each site visit. (See page 2 of the letter report.)

Protocol surveys are specifically designed to maximize detectability of gnatcatchers, should they be on the site. Additionally, surveys conducted during June and July would identify whether the site is being used by breeding pairs; in contrast, surveys conducted during December, when gnatcatchers are typically dispersing throughout both breeding and non-breeding habitats, would not be as successful in identifying gnatcatchers' use of the particular habitat location. The breeding season of the gnatcatcher typically extends from February 15 through August 30, and U.S. Fish and Wildlife Service protocol specifically recommends that surveys be conducted between February 15 and August 30 to maximize detectability (USFWS 1997). Energy demands for bird species are at their highest during the rearing of young, and gnatcatchers, which are found almost exclusively in sage scrub habitat, typically use those habitat areas where adequate food resources are available to successfully fledge young. If a site is being used by breeding pairs during the breeding season, this fact would tend to indicate that the habitat is valued by the birds. The absence of gnatcatchers in the habitat during the breeding season would tend to indicate that the habitat is not valued highly by the gnatcatcher for breeding.

The negative results from three site visits to the Unit 6 site as part of the HELIX 2001 protocol survey, together with the negative results from three additional site visits as part of the HELIX 2007 protocol survey, confirm that Unit 6 is not being utilized as breeding habitat for gnatcatchers and is not occupied by the gnatcatcher. This finding confirms the EIR's prior conclusion that this site is of low long-term conservation value, and that the proposed off-site mitigation is more than adequate for the loss of this habitat. See Response to Comment PG-8, and FEIR Response to Comment Q-33. Therefore, these comments do not constitute significant new information under Public Resources Code section 21092.1 or section 15088.5 requiring recirculation of the EIR.



PG-14	The County acknowledges and appreciates this comment. However, this comment fails to make a substantive comment regarding the adequacy of the draft EIR analysis.
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# ATTACHMENT FOR PG-13



7578 El Cajon Boulevard, Suite 200

La Mesa, CA 91941

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phone (619) 462-1515

Inland Empire Office

phone (951) 328-1700

September 4, 2007

LEN-13

Dr. Glenn Russell  
County of San Diego  
Department of Planning and Land Use  
5201 Ruffin Road, Suite B  
San Diego, CA 92123

Subject: Year 2007 Protocol Gnatcatcher Surveys for Bridges Unit 6

Dear Dr. Russell:

This letter presents results of a U.S. Fish and Wildlife Service (USFWS) protocol coastal California gnatcatcher (*Poliophtila californica californica*) survey for the Bridges Unit 6 project (the "Survey"), and responds to a letter of comment from Ms. Ginger Perkins dated April 13, 2007 and a letter from Andrew Mauro dated April 9, 2007 provided as an attachment to the Ginger Perkins letter (together, the "Comment Letters"). The Survey was conducted under HELIX's Threatened/Endangered Species Permit (TE778195).

## INTRODUCTION

The approximately 9.2-acre proposed project site for Unit 6 is located in an unincorporated community of San Diego County (Figure 1) south of State Route 78 and north of Del Dios Highway (Figure 2). Specifically, the site is north of Avenida Del Duque between Bumann Road and Via De Las Flores.

The project includes vacation of an approximately 9.2-acre biological open space easement in Unit 6 and its subsequent subdivision, which would include five residential estate lots, three roadway lots, a utility easement, and a fuel modification zone. The proposed residential subdivision improvements for Unit 6 would also include the construction of an emergency access road between Calle Ponte Bella and the western boundary of Unit 6, which would continue off site and connect with Bumann Road in Encinitas to the west.

## THE COMMENT LETTERS

The commenter reports having seen gnatcatchers at or near Unit 6. The commenter's letter also attached another letter in which its author reports for the first time that members of the Audubon Society participating in successive Audubon Christmas Bird Counts conducted from 2003 through 2006 have "encountered California Gnatcatchers at several different locations along our route within the golf course, and have "consistently observed at least one pair of



gnatcatchers in the undeveloped patch of sagebrush habitat that exists along the edge of the cart path which skirts the 12<sup>th</sup> hole fairway and leads to the 13<sup>th</sup> hole tee," and "recorded a minimum of six pairs of California Gnatcatchers in this general location" during the survey on December 19, 2006. These reported sightings were stated to have been made by a team, which included members of the Audubon Society, including members who are also members of the San Diego Field Ornithologists, as well as amateurs, but were not the result of protocol surveys for the gnatcatcher.

In response to the questions raised by the Comment Letters, the Survey for California Gnatcatchers was conducted, with three site visits between June 20, 2007 and July 4, 2007. This Survey and each of the site visits were conducted in accordance with the latest United States Fish and Wildlife (the "USFWS") protocol for presence/absence of species (USFWS 1997). The details of the actual survey are described below.

## METHODS

The protocol Survey consisted of three site visits which were conducted according to the schedule in Table 1. The amount of potential gnatcatcher habitat present on site is approximately 8.27 acres. Each site visit was conducted by walking through the relatively open habitat (Figure 3) with the aid of binoculars and taped gnatcatcher vocalizations, which were played approximately every 3 to 5 minutes.

The area surveyed during each site visit included the specific area referenced by Mr. Mauro in his April 9, 2007 letter identified as the "undeveloped patch of sagebrush habitat that exists along the edge of the cart path which skirts the 12<sup>th</sup> hole fairway and leads to the 13<sup>th</sup> hole tee." It should also be noted that the survey routes identified in Figure 3 show the physical locations where the surveyor walked the site. These survey routes resulted in 100 percent coverage of the entire study area, not just the physical locations of the survey route, including the area identified by Mr. Mauro. If gnatcatchers had been present, they would have been readily observable within the areas between the survey routes, especially by experienced surveyors familiar with both visual and vocal identification of the gnatcatcher as was used during the HELIX site visits. Additionally, the use of taped vocalizations of the gnatcatcher, consistent with USFWS protocol for the species, is specifically intended to maximize detectability of the species.

The USFWS protocol has been specifically developed to maximize detectability of the species. This protocol was developed by a panel of professional biologists considered the foremost experts on the gnatcatcher in collaboration with the USFWS, and has been used as the standard for determining presence or absence of the gnatcatcher for properties throughout San Diego County.



Protocol surveys are specifically designed to maximize detectability of gnatcatchers, should they be on the site. Additionally, surveys conducted during June and July would identify whether the site is being used by the breeding pairs during the breeding season. The breeding season of the gnatcatcher typically extends from February 15 through August 30, and the U.S. Fish and Wildlife Service protocol specifically recommends that surveys be conducted between February 15 and August 30 to maximize detectability (USFWS 1997). Energy demands for bird species are at their highest during the rearing of young, and gnatcatchers which are found almost exclusively in sage scrub habitat, typically use those habitat areas where adequate food resources are available to successfully fledge young. If a site is being used by breeding pairs during the breeding season, this fact would tend to indicate that the habitat is valued by the birds. The absence of gnatcatchers in the habitat during the breeding season would tend to indicate that the habitat is not valued highly by the gnatcatchers for breeding.

**Table 1**  
**SURVEY INFORMATION**

Survey Date; Biologist	Start/Stop Times	Acres (ac) Surveyed /Coverage Rate Per Hour	Weather Conditions Start/Stop
June 20, 2007 Deborah Leonard	0615/0700	8.56 ac/11.4 ac	Overcast, 65°F, wind 0-2 mph/Overcast, 65°F, wind 0-2 mph
June 27, 2007 W. Larry Sward	0845/1030	8.56 ac/4.9 ac	Overcast, 67°F, wind 0 mph/Sunny, 74°F, wind 0-2 mph
July 4, 2007 Deborah Leonard	1000/1045	8.56 ac/11.4 ac	Overcast, 69°F, wind 0-2 mph/Overcast, 72°F, wind 0-2 mph

## **VEGETATION COMMUNITIES/HABITATS**

Vegetation communities/habitats within the survey area include Diegan coastal sage scrub (including disturbed) and developed land (Figure 3). Each type is briefly described below.

### **Diegan Coastal Sage Scrub (including disturbed)**

Coastal sage scrub is one of the two major shrub types that occur in California. This habitat type occupies xeric sites characterized by shallow soils. On site, Diegan coastal sage scrub is dominated on site by California sagebrush (*Artemisia*



*californica*) and California buckwheat (*Eriogonum fasciculatum*). Disturbed Diegan coastal sage scrub contains significant non-native plant species cover.

### Developed

Developed land is where permanent structures and/or pavement may have been placed, preventing the growth of vegetation. It also includes maintained landscaping.

### SURVEY RESULTS

Coastal California gnatcatchers were not observed within the project site during any of the three visits as part of the 2007 protocol survey. The Unit 6 site was previously the subject of a USFWS protocol survey conducted by HELIX in 2001, which included three site visits to the Unit 6 site (HELIX 2001). Similarly, no gnatcatchers were observed on the Unit 6 site during the HELIX 2001 protocol survey.

We conclude that the Unit 6 site is currently not occupied by the coastal California gnatcatcher and is of low long-term conservation value based on the following:

- No gnatcatchers were detected at the Unit 6 site during the HELIX 2001 protocol survey which included 3 visits to the Unit 6 site.
- The 2007 protocol Survey for the gnatcatcher at the Unit 6 site consisted of 3 visits to the site, and detected no gnatcatchers.
- The small size of the site maximizes detectability of the species.
- Use of taped vocalizations maximizes the probability of detection.
- Surveys were conducted during the breeding season to determine whether the site is being used as breeding habitat.
- Absence of gnatcatchers at Unit 6 during the breeding season indicates that the habitat is not of high value to the gnatcatchers as breeding habitat.

Christmas bird counts are typically done in late December and early January. This is the time of year when gnatcatchers are most likely to be found in non-sage scrub habitats, as well as sage scrub habitat areas that are not necessarily utilized during the breeding season. Young of the year birds (birds that were born that summer) are dispersing into adjacent areas, and territorial birds from adjacent areas are expanding territories from smaller breeding territories to search out insects which are more limited during the winter months. Therefore, the fact that those contributing to the Comment Letters may have indeed observed a gnatcatcher utilizing areas adjacent to the golfcourse while conducting the Christmas Bird Count does not indicate that the habitat on Unit 6 is of significant conservation value for gnatcatchers. The fact that the site was not occupied by gnatcatchers



Letter to Dr. Glenn Russell  
September 4, 2007


Page 5 of 6

during protocol surveys during the breeding season in two separate years is more indicative of its relative value.

The U.S. Fish and Wildlife Service, California Department of Fish and Game and County of San Diego all have concluded that Unit 6 does not have long-term viability for the gnatcatcher in the region because of existing development to the south, west, and north, similar to the conclusion reached in the Draft Environmental Impact Report (DEIR). Based on its fragmentation and small parcel size, the Unit 6 site would not be targeted for long-term conservation even if the site were periodically occupied by the gnatcatcher. The DEIR focused mitigation efforts on acquisition of sage scrub habitats off site within areas considered core habitat for the species. The mitigation parcels proposed by the project are known to support the gnatcatcher and will contribute to the long-term conservation of the species because they are located within large blocks of conserved coastal sage scrub habitat that supports significant gnatcatcher populations.

In summary, protocol surveys in both 2001 and 2007 for the coastal California gnatcatcher on Unit 6 were negative. The site is isolated from other habitat by existing development on three sides, while the proposed mitigation site occurs within surrounding large blocks of high quality habitat. The results of the 2007 Survey confirms the DEIR's prior conclusion that the Unit 6 site is of low long-term conservation value, and that the proposed off-site mitigation is more than adequate for the loss of this habitat.

Sincerely,

  
for Barry L. Jones  
Senior Consulting Biologist

Enclosures: Figure 1 Regional Location Map  
2 Project Location Map  
3 Vegetation Map and Coastal California Gnatcatcher  
Survey Route



Letter to Dr. Glenn Russell  
September 4, 2007

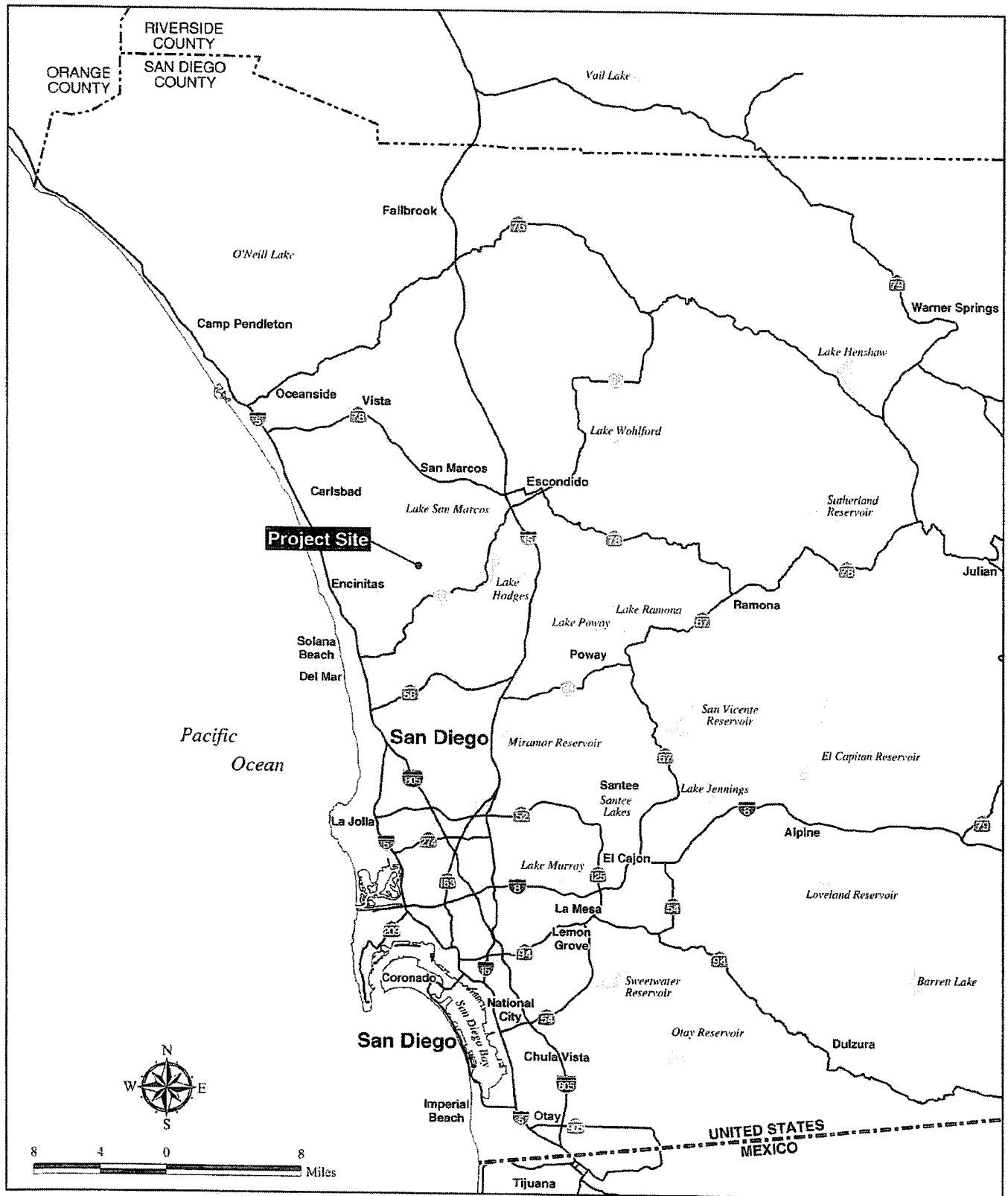
Page 6 of 6

#### REFERENCE

HELIX Environmental Planning, Inc. (HELIX). 2001. Protocol Surveys for the Coastal California Gnatcatcher on the Bridges Unit 6 and 7 Project. Unpublished report to U.S. Fish and Wildlife Service.

U.S. Fish and Wildlife Service (USFWS). 1997. Coastal California Gnatcatcher (*Poliophtila californica californica*) Presence/Absence Survey Guidelines. February 28.



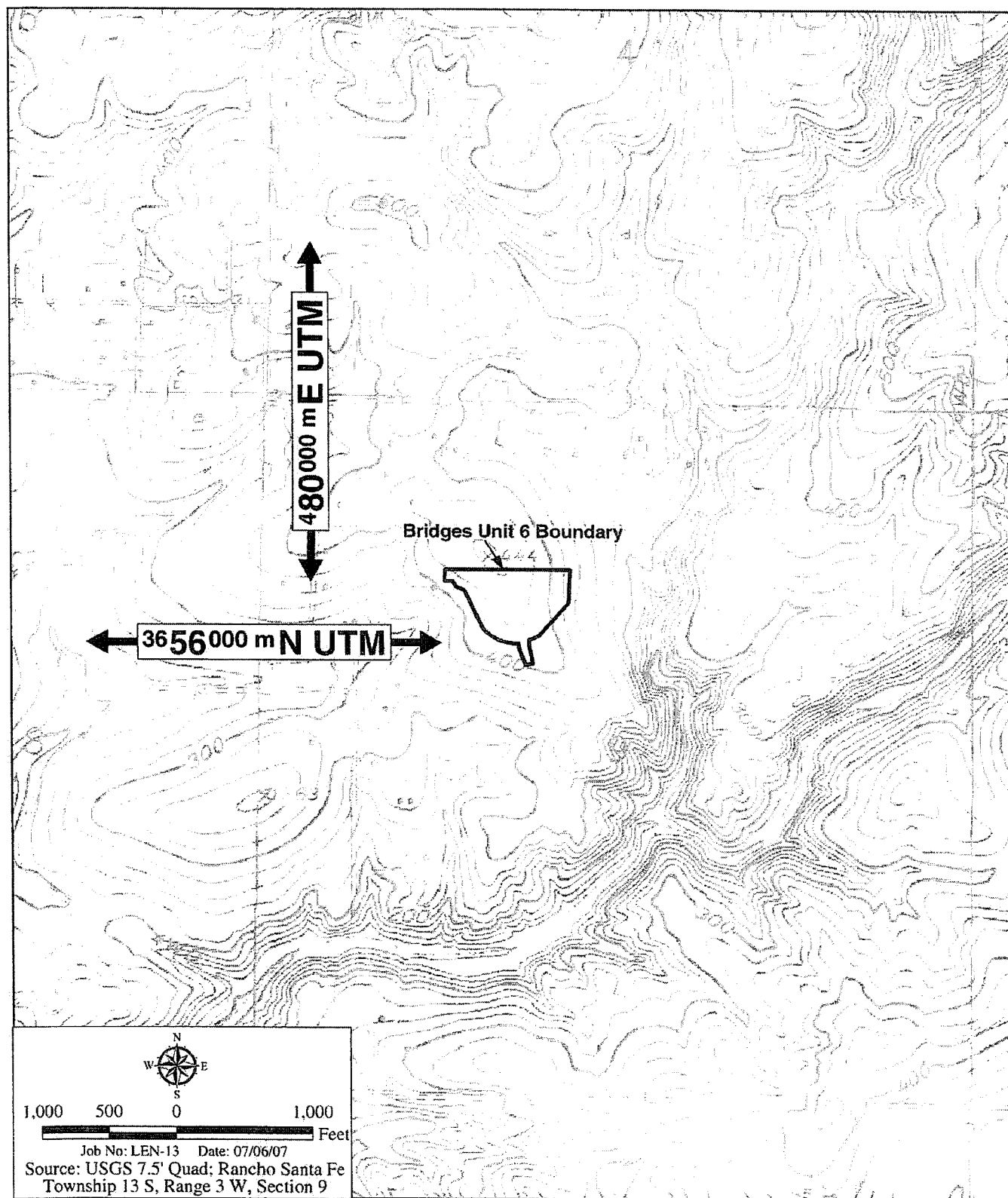


## Regional Location Map

BRIDGES

Figure 1

**HELIX**

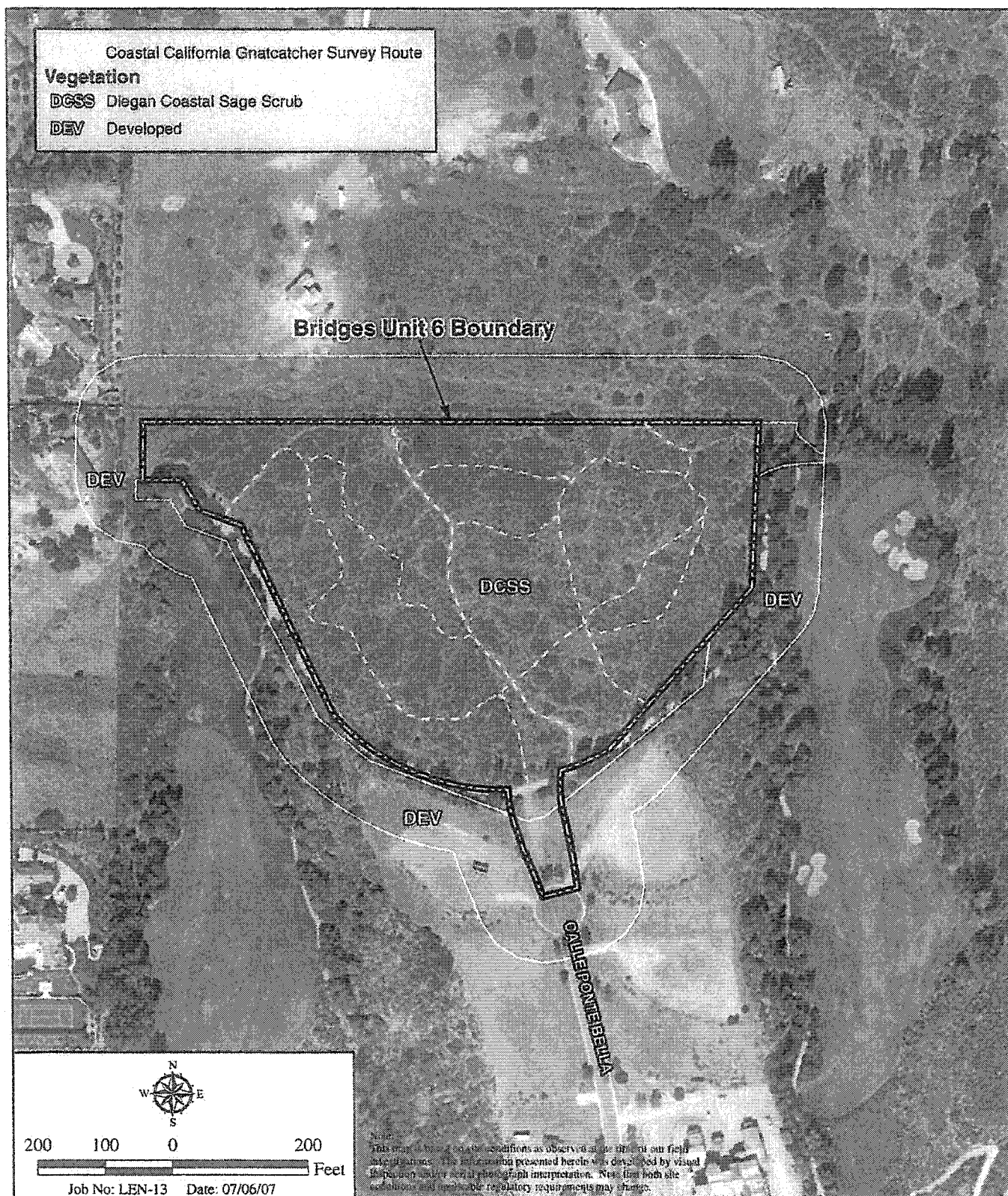


## Project Location Map

BRIDGES

Figure 2

**HELIX**



**Vegetation Map and Coastal California Gnatcatcher Survey Route**

**HELIX**

BRIDGES

Figure 3



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July 9, 2007

LEN-13

Ms. Sandy Marquez  
U.S. Fish and Wildlife Service  
6010 Hidden Valley Rd.  
Carlsbad, CA 92011

Subject: Year 2007 Protocol Gnatcatcher Survey Report for Bridges Unit 6

Dear Ms. Marquez:

This letter presents results of a U.S. Fish and Wildlife Service (USFWS) protocol coastal California gnatcatcher (*Poliophtila californica californica*) survey for the Bridges Unit 6 project. The survey was conducted under HELIX's Threatened/Endangered Species Permit (TE778195).

## INTRODUCTION

The approximately 9.2-acre proposed project site is located in an unincorporated community of San Diego County (Figure 1) south of State Route 78 and north of Del Dios Highway (Figure 2). Specifically, the site is north of Avenida Del Duque between Bumann Road and Via De Las Flores.

The project includes vacation of an approximately 9.2-acre biological open space easement in Unit 6 and its subsequent subdivision, which would include five residential estate lots, three roadway lots, a utility easement, and a fuel modification zone. The proposed residential subdivision improvements for Unit 6 would also include the construction of an emergency access road between Calle Ponte Bella and the western boundary of Unit 6, which would continue off site and connect with Bumann Road in Encinitas to the west.

## METHODS

Three site visits were conducted according to the schedule in Table 1. The amount of potential gnatcatcher habitat present on site is approximately 8.56 acres. The survey was conducted by walking through the relatively open habitat (Figure 3) with the aid of binoculars and taped gnatcatcher vocalizations played approximately every 3 to 5 minutes. The site was previously surveyed in 2001 (HELIX 2001).



Table 1  
SURVEY INFORMATION

Survey Date; Biologist	Start/Stop Times	Acres (ac) Surveyed Per Hr/Coverage Rate Per Biologist	Weather Conditions Start/Stop
June 20, 2007 Deborah Leonard	0615/0700	8.56 ac/11.4 ac	Overcast, 65°F, wind 0-2 mph/Overcast, 65°F, wind 0-2 mph
June 27, 2007 W. Larry Sward	845/1030	8.56 ac/4.9 ac	Overcast, 67°F, wind 0 mph/Sunny, 74°F, wind 0-2 mph
July 4, 2007 Deborah Leonard	1000/1045	8.56 ac/11.4 ac	Overcast, 69°F, wind 0-2 mph/Overcast, 72°F, wind 0-2 mph

#### VEGETATION COMMUNITIES/HABITATS

Vegetation communities/habitats within the survey area include Diegan coastal sage scrub (including disturbed) and developed land (Figure 3). Each type is briefly described below.

##### Diegan Coastal Sage Scrub (including disturbed)

Coastal sage scrub is one of the two major shrub types that occur in California. This habitat type occupies xeric sites characterized by shallow soils. On site, Diegan coastal sage scrub is dominated on site by California sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*). Disturbed Diegan coastal sage scrub contains significant non-native plant species cover.

##### Developed

Developed land is where permanent structures and/or pavement may have been placed, preventing the growth of vegetation. It also includes maintained landscaping.

#### SURVEY RESULTS

Coastal California gnatcatchers were not observed within the project site, although the quality and size of the on-site Diegan coastal sage scrub is moderate and large enough to support a pair of gnatcatchers. Similarly, no gnatcatchers were observed during 2001 protocol surveys of the site (HELIX 2001).



Letter Report to Ms. Sandy Marquez  
July 9, 2007

Page 3 of 3

We certify that the information contained in this survey report and the attached exhibits fully and accurately represent our work.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Leonard".

Deborah Leonard  
Senior Scientist  
TE778195

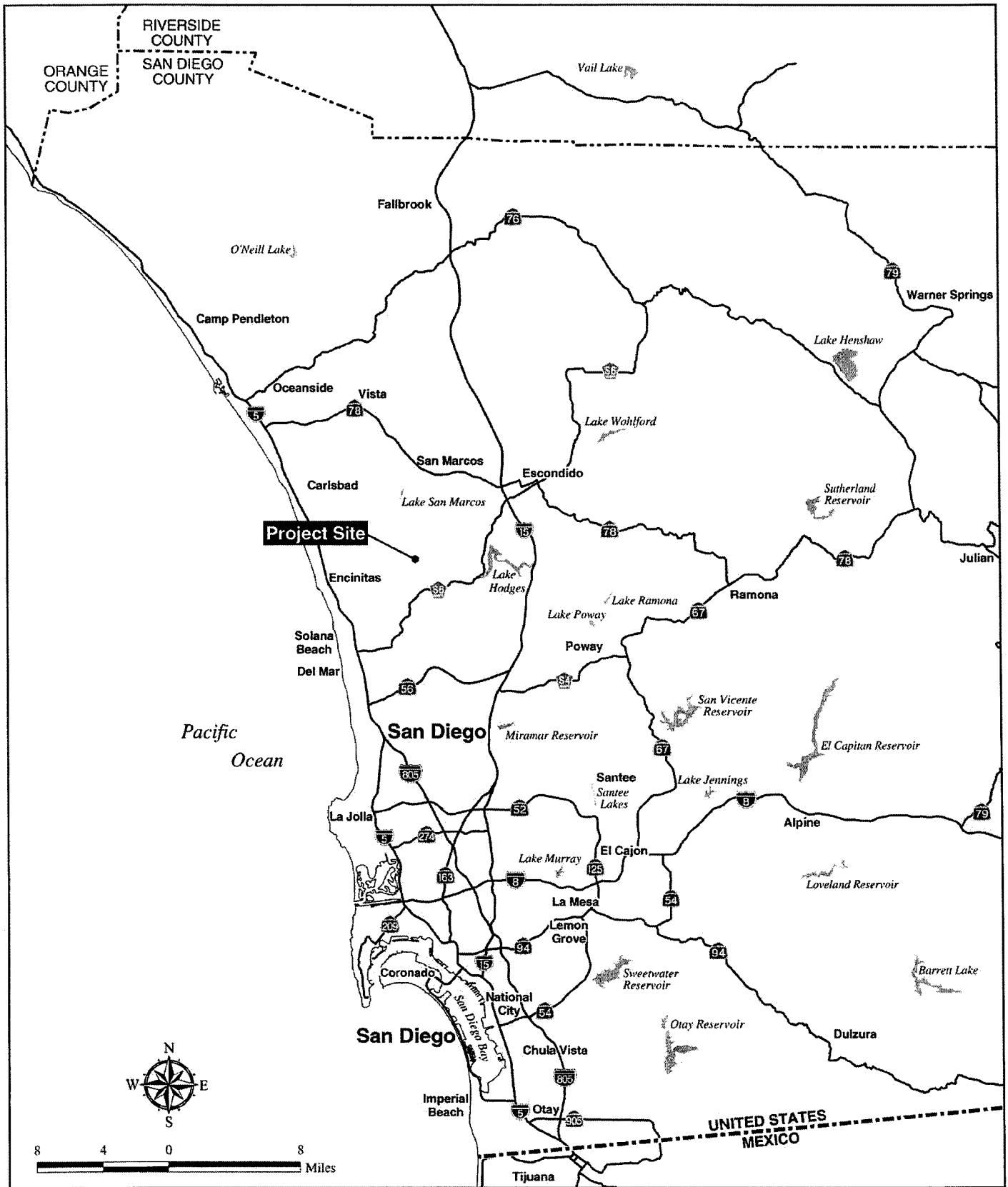
A handwritten signature in black ink, appearing to read "W. Sward".

W. Larry Sward  
Senior Scientist  
TE778195

Enclosures: Figure 1 Regional Location Map  
2 Project Location Map  
3 Vegetation Map and Coastal California Gnatcatcher  
Survey Route

#### REFERENCE

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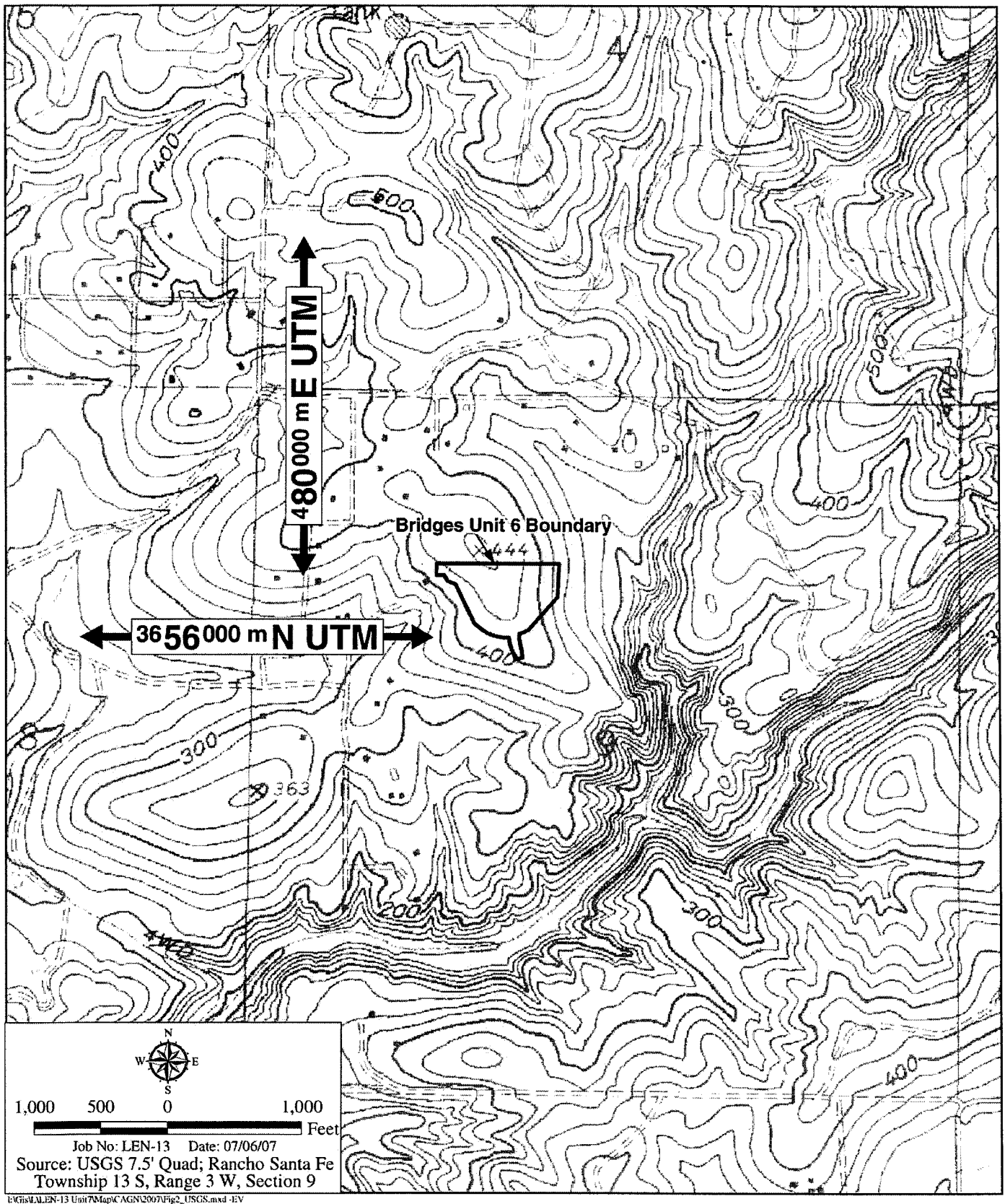


## Regional Location Map

BRIDGES

Figure 1

**HELIX**



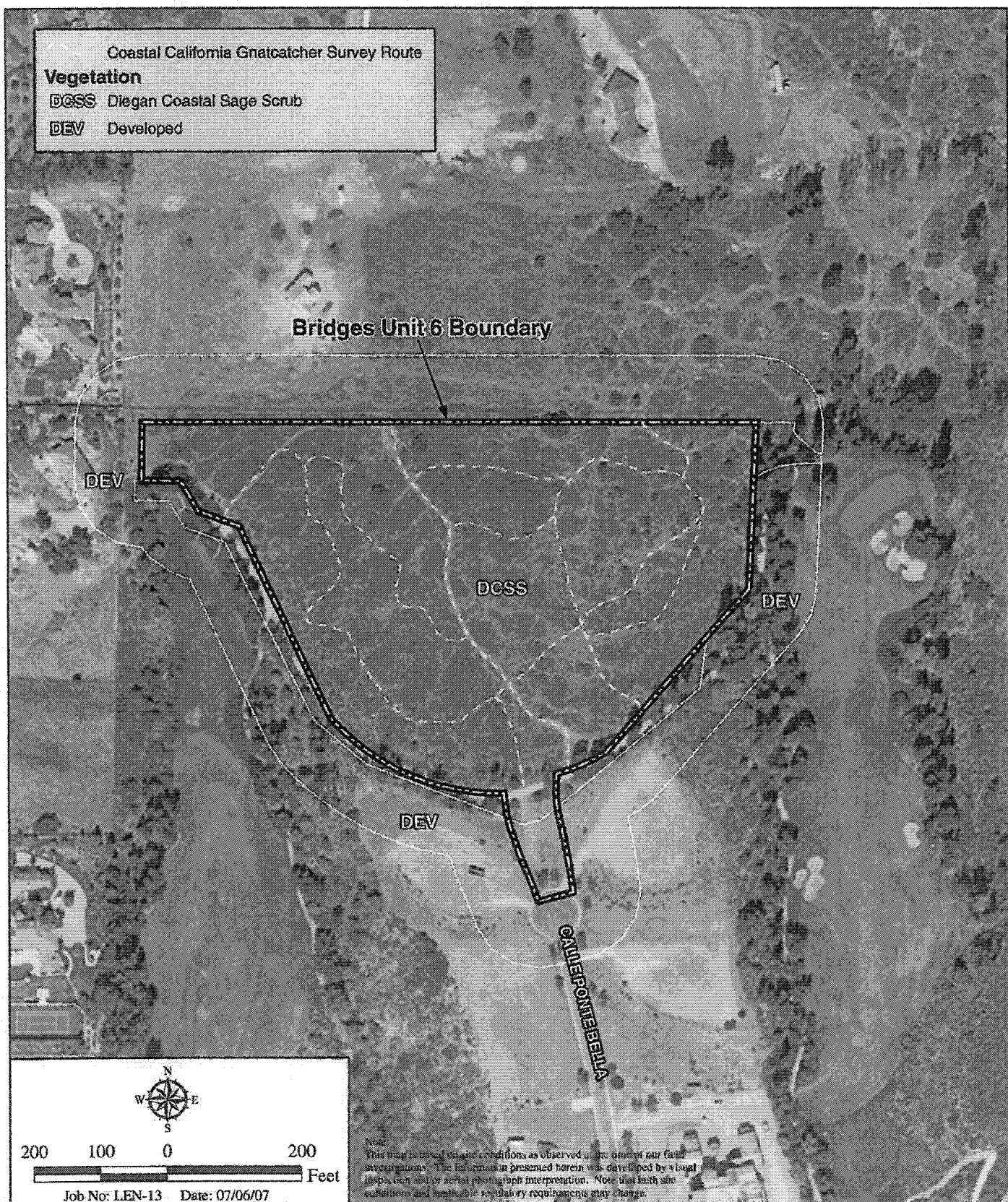
**Project Location Map**

BRIDGES

Figure 2

**HELIX**





## Vegetation Map and Coastal California Gnatcatcher Survey Route

BRIDGES

Figure 3

HELIX

**BOARD OF DIRECTORS**

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**Rancho Santa Fe Association**

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(858) 756-1174 • FAX (858) 756-9814

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Robert J. Green  
Building Commissioner

May 23, 2006

San Diego County Planning Commission  
c/o Mr. Bill Stocks, DPLU  
5201 Ruffin Rd., Suite B  
San Diego, CA 92123

Re: The Bridges Unit 6/SPA 01-004, TM 5270 RPL, P85-084W, P85-064W, The  
Bridges Unit 7/TM 5239RPL, AD 01-001, Sol-077; and Santa Fe Creek/SPA 03-006

Dear Planning Commissioners:

Because the above listed proposals are so complex and because they present significant ramifications for the community, the Rancho Santa Fe Association requests that your review of the applications be postponed so that the applicant can present their proposals, including associated impacts and proposed mitigations, directly to the Rancho Santa Fe Association for its review and consideration. With so much on the table and so much at stake, a full and careful review is both prudent and warranted.

RSF-1

The Association continues to have serious concerns about the increase in traffic generation created by the above listed requests and in particular by the additional proposed 29 residential lots in Unit 7. As previously stated, the Association continues to be concerned with circulation impacts especially at the intersections of El Camino del Norte and Aliso Canyon Road and at El Camino del Norte and Del Dios Highway. With a new school site proposed to be located just southerly of the Bridges, traffic circulation and level of service (LOS) are critical concerns at these two key Covenant intersections as is the issue of emergency access (attached letter).

RSF-2

At the Association's request, the County is in the process of designing and installing three County-approved roundabouts at key Paseo Delicias/Del Dios intersections including the intersection at Del Dios/El Camino del Norte. Roundabouts are now acceptable County intersection control devices and are the preferred control for Rancho Santa Fe intersections due to their ability to simultaneously increase capacity, calm traffic and lessen the number and severity of accidents. Roundabouts are also particularly effective at enhancing pedestrian safety; an important feature for an intersection near a school site.

RSF-3